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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Amanda Doell,

Plaintiff,

vs.

Cardenas Markets, LLC, a Foreign Limited-Liability
Company, dba Cardenas; Doe Manager; Does II
through X; and Roe Corporations I through X,
inclusive,

Defendant.

Case No.: 2:23-cv-1056-JCM-DJA

**Stipulation and ~~Proposed~~ Order TO
Extend Discovery Deadlines and
Amend Current Discovery Plan and
Scheduling Order (ECF No. 13)**

Second Request

The parties hereby stipulate and agree, subject to this Court's approval, to extend the current discovery deadlines and amend the Discovery Plan and Scheduling order (ECF No. 13) by ninety 60) days. This is the first request to extend the discovery deadlines in this matter. The parties are in agreement that the requested extension is in the interest of all parties to allow the parties to efficiently litigate this case. The parties submit that this extension is sought in good faith and will not unduly delay these proceedings.

I. Discovery Completed To Date.

- a. Written discovery to Plaintiff;
- b. Written Discovery to Defendant
- c. Disclosure of Expert Witnesses

II. Discovery Left to Be Completed.

- a. Deposition of Plaintiff.
- b. Deposition of Defendant's 30(b)(6) Representative.
- c. Deposition of percipient witnesses
- d. Disclosure of expert witnesses.

III. Reasons for Requested Extension.

The parties request a short 60 day extension because of pending motion work that requires an extension. Cardenas filed a motion for a protective order on Plaintiff's proposed 30(b)(6) topics (ECF No. 15). The Court set a hearing for March 26th (ECF No. 16). This is the day after discovery closes. Because the result of this hearing has an effect on the other depositions in this case, the parties request a short 60day extension to finish discovery and the pending motion work.

IV. Current Deadlines and Requested Extension

	Current	Proposed
Amending the Pleadings and Adding Parties	September 27, 2023	CLOSED
Initial Expert Disclosures	December 26, 2023	CLOSED
Rebuttal Expert Disclosures	January 25, 2024	CLOSED
Discovery Closes	March 25, 2024	May 24, 2024
Dispositive Motions	April 24, 2024	June 21, 2024
Pre-Trial Order, if no Dispositive Motions	May 24, 2024	July 19, 2024

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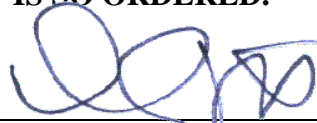
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Therefore, the parties respectfully request that the Court enter an order approving the proposed discovery schedule as set forth above.

 WILSON ELSE <small>WILSON ELSE MOSKOWITZ EDELMAN & DICKER LLP</small>	MOSS BERG INJURY LAWYERS
<u>/s/ Jonathan C. Pattillo, Esq.</u> Michael P. Lowry, Esq. Nevada Bar No. 10666 Jonathan C. Pattillo, Esq. Nevada Bar No. 13929 Attorneys for Cardenas Markets, LLC	<u>/s/ Boyd B. Moss, Esq.</u> Boyd B. Moss III, Esq. Nevada Bar No. 8856 John C. Funk, Esq. Nevada Bar No. 9255 Attorneys for Amanda Doell

ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 3/4/2024